

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CONVERGEN ENERGY LLC, L'ANSE WARDEN
ELECTRIC COMPANY, LLC, EUROENERGY
BIOGAS LATVIA LIMITED, and LIBRA CAPITAL
US, INC.

Plaintiffs,

-against-

STEVEN J. BROOKS, NIAN TICVISTA ENERGY
LLC, GREGORY MERLE, RIVERVIEW ENERGY
CORPORATION, DANIEL ESCANDON GARCIA,
RAMON URIARTE INCHAUSTI, CHIPPER
INVESTMENT SCR, SA, URINCHA SL, THEODORE
JOHN HANSEN, BRIAN R. MIKKELSON, and
CONVERGEN ENERGY WI, LLC,

Defendants.

Index No. 1:20-cv-03746 (LJL)

NOTICE OF MOTION FOR RECONSIDERATION

PLEASE TAKE NOTICE, that upon the memorandum of law in support of its motion for reconsideration, dated August 19, 2020, and the accompanying Declarations of Dov Gold and Camilo Patrignani, Plaintiffs Convergen Energy LLC, L'Anse Warden Electric Company, LLC, Euroenergy Biogas Latvia Limited, and Libra Capital US, Inc. ("Plaintiffs") will move this court, before the honorable Judge Lewis J. Liman, at the federal courthouse located at 500 Pearl Street, New York, New York, 10007 on a date and at a time to be set by the Court, for an order pursuant to Rule 60(b) of the Federal Rules of Civil Procedure and Rule 6.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, granting reconsideration of the Court's August 5, 2020 Opinion and Order denying Plaintiffs motion to stay arbitration.

Dated: August 19, 2020
New York, New York

SEIDEN LAW GROUP, LLP

By: /s/ Michael Stolper

Michael Stolper

Dov B. Gold

Jake Nachmani

469 Seventh Avenue, Fifth Fl.

New York, NY 10018

(646) 766-1703

Counsel for Plaintiffs